

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

JOHN CRANNEY,

Defendant.

No. 14-cr-10276-IT

STIPULATIONS (FIRST)

The United States and John William Cranney hereby stipulate and agree as follows:

1. If called to testify, representatives of the financial institutions, businesses, and government agencies listed below would identify the trial exhibits detailed herein as authentic original records or duplicates of original records in the custody of their respective institutions and would further testify that:

- a. these records were made, at or near the time of the occurrence of the matters set forth, by (or from information transmitted by) a person with knowledge of those matters;
- b. these records were kept in the course of regularly conducted business activity;
- c. it was the regular practice of these businesses to make such records. and
- d. the financial institutions and trial exhibits are further identified as follows:
 1. Bank of America (exhibits 201 through 225, and all sub-parts);
 2. CyberTrader (exhibits 231, 232, and 233, and all sub-parts);
 3. Federal Reserve Bank of Boston (exhibits 235 and 236);
 4. The Hartford Life and Annuity Insurance Company (exhibit 237);
 5. Federal Deposit Insurance Corporation (exhibit 238);
 6. Charles Schwab & Company (exhibits 241 through 251, and all sub-parts);
 7. Lind-Waldock Company (exhibit 252 and all sub-parts); and
 8. Citibank (exhibits 165 and 166).

2. If called to testify, a representative of the Federal Reserve Bank of Boston would testify that the wire transfer transactions reflected in Exhibits 235 and 236 as Fedwire fund transfers involved interstate wire communications.

3. If called to testify, a representative of The Hartford Life and Annuity Insurance Company would testify that the wire transfer transaction reflected in Exhibit 237 as a fund transfer involved interstate wire communications.

4. If called to testify, a representative of the Federal Deposit Insurance Corporation (FDIC) would testify that at all times relevant to the matters under indictment, Bank of America, National Association, was a federally insured depository institution, the deposits of which were insured by the FDIC.

5. If called to testify, representatives of American Express would identify the account records contained in exhibits 261 through 265 (and all sub-parts) and testify that the records so marked are original records or duplicates of original records in the custody of their respective financial institutions and would further testify that:

- a. these records were made, at or near the time of the occurrence of the matters set forth, by (or from information transmitted by) a person with knowledge of those matters;
- b. these records were kept in the course of regularly conducted business activity;
- c. it was the regular practice of these businesses to make such records.

The Defendant will not raise any objection as to the authenticity or foundation as business records of the records described above.

Respectfully submitted,

JOHN W. CRANNEY

Respectfully submitted,

WILLIAM D. WEINREB
Acting United States Attorney

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